

## REMARKS

The Office Action dated March 16, 2004 has been received and carefully considered. Claims 1, 2, 5, 7, 9, 10, 13, 15 and 17-20 have been amended to improve their form and readability. These amendments do not affect the scope of the claims. Support for the amendments to the claims may be found in the specification as originally filed. No new matter is introduced by the amendments to the claims. Reconsideration of the outstanding objections and rejections in the present application therefore is respectfully requested based on the following remarks.

### Anticipation Rejection of Claims 1, 9 and 17-20

At page 2 of the Office Action, claims 1, 9 and 17-20 were rejected under 35 U.S.C. § 102(b) as being anticipated by Ross (U.S. Patent No. 5,909,594). This rejection is respectfully traversed.

Claim 1, from which claims 2-8 depend, recites, in part, the limitations of a first bus device interface comprising a first incoming request bus for receiving one or more request packets *from a first bus device* and a second bus device interface comprising a second incoming request bus for receiving one or more request packets *from a second bus device*. Claim 9, from which claims 10-16 depend, claim 17, from which claim 18 depends, and claim 19, from which claim 20 depends, recite similar limitations. With respect to these limitations, the Examiner asserts that the "Port\_req coming in" disclosed by Ross is equivalent to the limitations of the incoming request bus for receiving one or more request packets from a bus device as recited in claims 1, 9, 17 and 19. Office Action, p. 2. Based on the Examiner's comments, the Applicants assume that the "Port\_req coming in" refers to the Port\_Req signal received at element 410 from element 409.

Contrary to the Examiner's assertions, it is respectfully submitted that Ross fails to disclose at least the limitations of first and second incoming request busses for receiving request packets from corresponding first and second bus devices as recited in claims 1, 9, 17 and 19. Instead, Ross discloses the transmission of a connection request (port\_req) from the request manager 407 "to the destination link controller associated with that packet's destination." See

Ross, col. 16, lines 4-7. *See also* Figure 10 of Ross (illustrating the transmission of "Port\_Req" from request manager 407 to crossbar connection arbiter 410 via switching matrix 409). As disclosed by the specification and Figure 10 of Ross, the request manager 407 is part of the source link controller 401, which in turn is part of a packet switched router (e.g., packet switched router 201, Fig. 8). Thus, the port\_req/connection request of Ross is generated, transmitted, and received *internal to the source link controller and the destination link controller* (the combination of which the Examiner appears to consider equivalent to a bus device interface of the present claims). In contrast, claims 1, 9 and 17 recite the reception of one or more request packets from bus devices which are *external to the bus device interface*. Accordingly, the Applicants respectfully submit that the Office Action fails to establish that Ross discloses or suggests the limitations of incoming busses for receiving one or more request packets from corresponding bus devices as recited in claims 1, 9, 17 and 19 and therefore fails to establish that Ross discloses or suggests each and every limitation recited in claims 1, 9 and 17.

In addition, it is respectfully submitted that Ross fails to disclose each and every limitation of claims 2-8, 10-16, 18 and 20 at least by virtue of their dependency from one of claims 1, 9, 17 and 19. Moreover, these claims recite additional limitations that the cited references fail to disclose, alone or in combination. For example, with respect to claim 18, the Examiner states that Ross "teaches acknowledgement of packets." Office Action, p. 2. However, it is respectfully submitted that claim 18 does not simply recite the limitation of acknowledging packets. Rather, claim 18 recites the additional limitations of receiving an acknowledgement response packet from a second device on an incoming request bus coupled to the second bus device *concurrently with the reception of a data packet from the second bus device*. The Office Action fails to address these additional limitations. As another example, claim 20 recites the limitations of receiving a data write request packet and receiving a data packet concurrently. With regard to claim 20, the Office Action simply states that Ross "teaches multiple concurrent packages" without citing a particular passage of Ross in support of this assertion. Should the Examiner continue to uphold the anticipation rejection of claim 20 in view of the remarks herein, the Applicants respectfully request that the Examiner more specifically address how Ross discloses the limitations of claim 20.

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In view of the foregoing, it is respectfully submitted that the anticipation rejection of claims 1, 9 and 17-20 is improper and the withdrawal of this rejection therefore is respectfully requested.

### **Obviousness Rejection of Claims 2-8 and 10-16**

At page 3 of the Office Action, claims 2-8 and 10-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ross in view of Koivunen (U.S. Patent No. 5,577,102). This rejection is respectfully traversed.

As noted above, Ross fails to disclose or suggest at least the limitations of a first bus device interface comprising a first incoming request bus for receiving one or more request packets from a first bus device and a second bus device interface comprising a second incoming request bus for receiving one or more request packets from a second bus device as recited in claims 1 and 9, from which claims 2-8 and 10-16 depend, respectively. The Office Action fails to establish that Koivunen discloses or suggests these limitations. Accordingly, the Applicants respectfully submit that the Office Action fails to establish that the proposed combination of Ross and Koivunen discloses or even suggests each and every limitation of claims 2-8 and 10-16 at least by virtue of their dependency on one of claims 1 or 9. Moreover, these claims recite additional limitations neither disclosed nor suggested by Ross or Koivunen, alone or in combination.

Accordingly, it is respectfully submitted that the obviousness rejection of claims 2-8 and 10-16 is improper and the withdrawal of this rejection therefore is respectfully requested.

### **Conclusion**

In view of the foregoing, the Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

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The Applicants do not believe that any additional fees are due, but if the Commissioner believes additional fees are due, the Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account Number 01-0365.

Respectfully submitted,

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Date



Ryan S. Davidson, Reg. No. 51,596,  
On Behalf Of  
J. Gustav Larson, Reg. No. 39,263,  
Attorney for Applicant(s)  
TOLER, LARSON & ABEL, L.L.P.  
5000 Plaza On The Lake, Suite 265  
Austin, Texas 78746  
(512) 327-5515 (phone) (512) 327-5452 (fax)

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